

COUNT 2

(Interstate Transportation of Stolen Goods, 18 U.S.C. § 2314)

The Grand Jury further charges:

2. On or about the January 26, 2023, in the Northern District of Ohio, Eastern Division, the defendant, DAMARCO MCKINLEY, did unlawfully transport, transmit, and transfer, and cause to be transported, transmitted, and transferred, in interstate commerce, from Ohio to Indiana, goods, wares, and merchandise of the value of \$5,000 or more, to wit: eight Apple iPads and sixteen Apple iPhones valued at approximately \$29,124.56, knowing the same to have been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section 2314.

FORFEITURE

The Grand Jury further charges:

3. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 and 2 are incorporated herein by reference. As a result of the foregoing offenses, Defendants DUSTIN JAGGER and DAMARCO MCKINLEY, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violations charged herein.

SUBSTITUTE ASSETS

If, as a result of any act or omission Defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been comingled with other property which cannot be subdivided
without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as
incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other
property of Defendants, up to the value of the forfeitable property described above.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government
Act of 2002.